

# ***Exhibit A***

IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF PENNSYLVANIA

ANTHONY DeFRANCO,  
Plaintiff,

V.

WILLIAM WOLFE, et al.,  
Defendants.

:  
: No. C.A. 04-230E  
: Magistrate Judge Baxter  
: District Judge Cohill  
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:  
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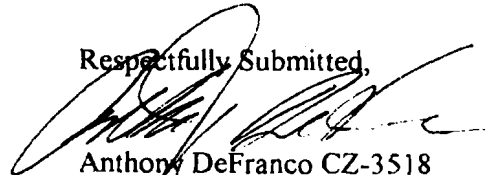
DEFENDANTS' RESPONSE TO  
**PLAINTIFF'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS**

Plaintiff requests, in accordance with discovery Rules, the following documents:

1. Please produce the employee roster for the staff that were working at SCI Albion on March 7<sup>th</sup>, 2005, on the second shift (from 2 pm until 10 pm). SEE ATTACHED SHEET FOR RESPONSES.
2. Please produce the exact date on which a Ms. Eichenlaub (prior psychologist) stated she met with plaintiff regarding z-code. All prior responses have failed to answer this specific question. While defendants object to producing the actual 'document', providing plaintiff with a specific date of when Ms. Eichenlaub purportedly consulted with plaintiff does not pose a security issue, and is material to the case.
3. Please produce plaintiff's 'block reports', that is, a file that guards write in to report behavior.
4. Please produce plaintiff's complete cell location through-out his incarceration from 1993 until 2002; and when he was in a cell alone.

Date: June 9, 2006

Respectfully Submitted,



Anthony DeFranco CZ-3518  
10745 Route 18  
Albion, Pa. 16475-0002

**Certificate of Service**

Service was made by US First  
Class Mail this date to the  
Attorney General at 564  
Forbes Ave., Pgh. Pa. 15219

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ANTHONY DEFRANCO,

Plaintiff,

v.

WILLIAM WOLFE, ET AL.,

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C.A. No. 04-230 E

**DEFENDANTS' RESPONSE TO PLAINTIFF'S THIRD  
REQUEST FOR PRODUCTION OF DOCUMENTS**

1. This request is Objected to as seeking information that is privileged, confidential, irrelevant and not likely to lead to the discovery of admissible information. Providing this Roster could pose as a security risk to staff, inmates and/or the institution.

2. This information is maintained within plaintiff's psychiatric records, which plaintiff recently had the opportunity to view.

3. This request has already been responded to in plaintiff's second request for documents.

4. The plaintiff's cell history has already been provided in plaintiff's second request for documents.

Respectfully submitted,

THOMAS W. CORBETT, JR.

Attorney General

  
Mary L. Friedline

Senior Deputy Attorney General

Attorney I.D. No. 47046

Office of Attorney General  
6<sup>th</sup> Floor, Manor Complex  
564 Forbes Ave.  
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Fax: (412) 565-3019  
Date: June 19, 2006

Susan J. Forney  
Chief Deputy Attorney General

# ***Exhibit B***

IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF PENNSYLVANIA

ANTHONY DeFRANCO ,  
Plaintiff,

v.

WILLIAM WOLFE, et al.,  
Defendants.

:  
: No. C.A. 04-230-E  
: Magistrate Judge Baxter  
: District Judge Cohill  
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:  
:

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DEFENDANT'S RESPONSE TO  
PLAINTIFF'S FIRST INTERROGATORIES  
TO DEFENDANT MARILYN BROOKS (FOLLOW UP QUESTIONS)

In accordance with Rule 33 of Federal Rules of Civil Procedure, plaintiff requests that defendant answer the following interrogatories under oath, and that the answers be signed by the person making them and be served on plaintiff within 30 days.

If you cannot answer the following interrogatories in full, after exercising due diligence to secure the information to do so, so state and answer to the extent possible, specifying your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portions.

These interrogatories shall be deemed continuing, so as to require supplemental answers as new and different information materializes.

1. On March 7<sup>th</sup>, 2005, plaintiff was summoned to Intake at SCI Albion where there were 15 guards, more or less, simply to inform him that he was being transferred; some of these officers were Lt. Caldwell, Lt. Gilbert and Capt. Coleman. Please state if this is normal procedure to inform an inmate he was being transferred, and if so, please state when this has happened before.

ANSWER: SEE ATTACHED SHEET FOR RESPONSES.

2. Why was the above procedure used on plaintiff and so many officers present?

ANSWER:

3. After the above events, plaintiff was sent back to his cell to pack his belongings with an officer escort. Please state if it is normal procedure to send an officer escort when an inmate is packing his cell for transfer, why it happened to plaintiff, and if it has happened previously, describe when and to whom.

ANSWER:

Date:

BY: \_\_\_\_\_

*mailed by Plaintiff  
7/27/06*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ANTHONY DEFRANCO,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 04-230 E
	)	
WILLIAM WOLFE, ET AL..	)	

**DEFENDANT'S RESPONSE TO PLAINTIFF'S  
FIRST INTERROGATORIES TO DEFENDANT  
MARILYN BROOKS, (FOLLOW UP QUESTIONS)**

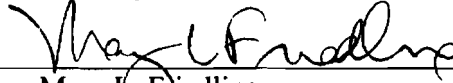
1. There is no specific procedure that dictates how an institution is to advise an inmate of transfers or to handle packing and escorts. Those decisions are within the discretion of the facility management and how such situations are handled (including the number of guards involved) will vary depending upon circumstances, including staff availability. There is no set normal or standard procedure. In any event, 15 guards were not used to inform plaintiff he was being transferred. This was done by officers Coleman and Gilbert, and if others were in the area, it was because they had other duties.

2. See response to number 1 above.

3. See response to number 1 above. As stated, if there was an escort while plaintiff packed in preparation for transfer, it would not have been unusual or atypical.

Respectfully submitted,

THOMAS W. CORBETT, JR.  
Attorney General

A handwritten signature in black ink, appearing to read "Mary L. Friedline", written over a horizontal line.

Mary L. Friedline  
Senior Deputy Attorney General  
Attorney I.D. No. 47046

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Susan J. Forney  
Chief Deputy Attorney General

Date: June 1, 2006